

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

8

United States of America

v.

Alhaj-Saleh Auday ABDALLAH

Case: 2:19-mj-30445
Assigned To : Unassigned
Assign. Date : 8/21/2019
Description: CMP USA v. ABDALLAH (SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 2018 to present in the county of Oakland and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Title 18 U.S.C. § 1204

Offense Description

Retaining a child (who has been in the United States) outside the United States
with intent to obstruct the lawful exercise of parental rights

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature

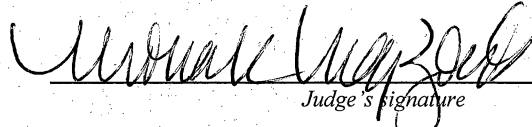
Special Agent Amy Hirina, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: **AUG 21 2019**

City and state: Detroit, Michigan



Judge's signature

Hon. Mona Majzoub, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Amy Hirina, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Detroit Division, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I have been employed as a Special Agent of the FBI since 2005. I am currently assigned to the FBI Detroit Division, Oakland County Resident Agency. While employed by the FBI, I have investigated a number of federal criminal violations including the online sexual exploitation of children and international parental kidnapping. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.

2. This affidavit is made in support of a complaint charging ALHAJ-SALEH AUDAY ABDALLAH with international parental kidnapping, in violation of Title 18, United States Code, Section 1204, specifically, retaining a child (who has been in the United States) outside

the United States with intent to obstruct the lawful exercise of parental rights.

3. The statements in this affidavit are based on my investigation of this matter, as well as the receipt of information from other FBI personnel and local law enforcement officers. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to law enforcement concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the aforementioned violation.

II. PROBABLE CAUSE

4. On February 22, 2019, Sawsan Hussein Ibrahim Aloudat, (DOB xx/xx/1990), reported a parental international kidnapping matter involving her ex-husband, ALHAJ-SALEH AUDAY ABDALLAH, (DOB xx/xx/1983). Aloudat and ABDALLAH have three minor children together MV-1 (DOB xx/xx/2008), MV-2 (DOB xx/xx/2009), and MV-3 (DOB xx/xx/2012).

5. In 2006, ABDALLAH and Aloudat were married in Jordan. On/about 2007, Aloudat moved to the United States with ABDALLAH.

Currently, ABDALLAH and Aloudat both maintain dual citizenship with the United States and Jordan.

6. In March 2015, a divorce between ABDALLAH and Aloudat was finalized through the Family Division of the Oakland County Circuit Court, within the Eastern District of Michigan. The Consent Judgment of Divorce included the following child custody arrangements for their minor children:

[P]rimary residence for Minor Children shall reside with Aloudat, Aloudat and ABDALLAH shall share legal and physical custody of Minor Children until they attain the age of 18 years.

7. Aloudat stated that throughout the relationship, ABDALLAH physically, verbally, and mentally abused her. In approximately March of 2017, one of their minor children saw ABDALLAH physically abuse Aloudat. The minor child told a school staff member about the incident. On March 7, 2017, the incident was reported to Children's Protective Services (CPS).

8. A review of the corresponding CPS report confirmed a case was opened and initiated on allegations of domestic violence and improper supervision. Aloudat advised that ABDALLAH departed to

Jordan shortly after the CPS report was filed, and has resided in Jordan since that time.

9. A review of the CPS report indicated numerous unsuccessful attempts to contact ABDALLAH. On April 4, 2017, the CPS case worker received a telephone message from ABDALLAH stating that he was in Jordan on family medical leave, and was not sure when he would be returning to Michigan.

10. Official travel records reveal that ABDALLAH boarded an international flight from Detroit on March 9, 2017.

11. Aloudat advised she allowed the minor children to be in contact with ABDALLAH via telephone and video chatting since he moved to Jordan in approximately March 2017. Aloudat told ABDALLAH about plans to bring the minor children to Jordan in February 2018 to visit with ABDALLAH and her family.

12. Official travel records revealed Aloudat boarded an international flight to Jordan on February 19, 2018. Aloudat advised that the minor children travelled with her to Jordan on this flight.

13. ABDALLAH refused to speak to Aloudat when she arrived in Jordan. During Aloudat's visit in Jordan, ABDALLAH obtained a travel

ban for the minor children from a court in Jordan. Aloudat was provided with a travel ban letter from the Jordanian court dated February 21, 2018. According to Aloudat, the letter stated that the minor children could not travel outside of Jordan. Aloudat went to the Jordanian court to contest the travel ban, but was unsuccessful in having the ban lifted.

14. Aloudat attempted to leave Jordan, and purchased tickets to return to the United States with the minor children. Aloudat's mother and brother drove Aloudat and her children to the airport. When the children's passports were scanned, Aloudat was told that the minor children had a travel restriction and could not travel.

15. Official travel records for Aloudat and the minor children revealed they were scheduled to be on an international flight to Detroit on March 8, 2018. The records indicated they were not onboard. Aloudat returned to the United States alone in March of 2018.

16. In March of 2018, sole legal and physical custody of the minor children was granted to Aloudat by the Oakland County court. Further, the order included that the minor children shall be immediately returned to the United States and to the care and custody of Aloudat.

17. In April of 2018, Aloudat returned to Jordan to see her children. Aloudat returned to the United States in late April 2018 without her children. Currently, she resides in the Eastern District of Michigan.

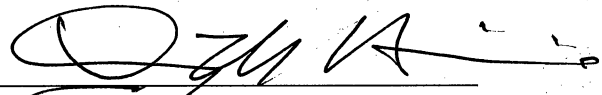
18. Aloudat has had sporadic contact via Facebook with the minor children since they began residing in Jordan. In early June 2019, Aloudat was blocked on the Facebook account the children used to communicate with her. She has not communicated with the minor children since that time.

19. In May 2019, the United States Attorney's Office in the Eastern District of Michigan issued a letter (via e-mail) to ABDALLAH to (1) inform him of the on-going FBI international parental kidnaping investigation; and (2) attempt to facilitate the return of the minor children to the United States.

20. On May 28, 2019, ABDALLAH confirmed receipt of the letter. ABDALLAH advised he and the minor children have dual citizenship with the United States and Jordan. ABDALLAH stated they are currently residing in Jordan, and the laws of Jordan have to be respected.

III. CONCLUSION

21. Probable cause exists that ALHAJ-SALEH AUDAY ABDALLAH did knowingly commit international parental kidnapping, in violation of Title 18, United States Code, Section 1204, specifically, retaining a child (who has been in the United States) outside the United States with intent to obstruct the lawful exercise of parental rights.


Special Agent Amy Hirina
Federal Bureau of Investigation

Subscribed and sworn before me on
this 21st day of August, 2019


HON. MONA MAJZOUB
UNITED STATES MAGISTRATE JUDGE